

[Parties and Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT TEMPORARY SEALING
MOTION (JOINT LETTER BRIEF
REGARDING PLAINTIFFS'
RESPONSES TO DEFENDANTS'
REQUESTS FOR PRODUCTION)**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), Plaintiffs and Defendants file this Joint Temporary Sealing Motion regarding the Parties' Joint Letter Brief Regarding Plaintiffs' Responses to Defendants' Requests for Production. Pursuant to that Order, the reasons for sealing (if any) will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Docket No.	Document	Designating Party
1051	Joint Letter Brief Regarding Plaintiffs' Responses to Defendants' Requests for Production	Plaintiffs

DATED: August 6, 2024

Respectfully submitted,

COVINGTON & BURLING LLP

By: /s/ Gregory L. Halperin
 Greg Halperin, pro hac vice
 COVINGTON & BURLING LLP
 The New York Times Building
 620 Eighth Avenue
 New York, NY 10018-1405
 Telephone: (212) 841-1166
 Facsimile: (212) 841-1010
 ghalperin@cov.com

Ashley M. Simonsen, SBN 275203
 COVINGTON & BURLING LLP
 1999 Avenue of the Stars
 Los Angeles, CA 90067
 Telephone: (424) 332-4800
 Facsimile: (424) 332-4749
 asimonsen@cov.com

Phyllis A. Jones, pro hac vice
 Paul W. Schmidt, pro hac vice
 COVINGTON & BURLING LLP
 One City Center
 850 Tenth Street, NW
 Washington, DC 20001-4956
 Telephone: (202) 662-6000
 Facsimile: (202) 662-6291
 pajones@cov.com

1 *Attorney for Defendants Meta Platforms, Inc. f/k/a*
2 *Facebook, Inc.; Facebook Holdings, LLC; Facebook*
3 *Operations, LLC; Facebook Payments, Inc.; Facebook*
4 *Technologies, LLC; Instagram, LLC; Siculus, Inc.; and*
5 *Mark Elliot Zuckerberg*

6 **FAEGRE DRINKER BIDDLE & REATH LLP**

7 By: /s/ Andrea R. Pierson
8 Andrea R. Pierson, pro hac vice
9 Amy Fiterman, pro hac vice
10 Faegre Drinker LLP
11 300 N. Meridian Street, Suite 2500
12 Indianapolis, IN 46204
13 Telephone: (317) 237-0300
14 Facsimile: (317) 237-1000
15 Andrea.pierson@faegredrinker.com
16 Amy.fiterman@faegredrinker.com

17 *Attorneys for Defendants TikTok Inc., ByteDance Inc.,*
18 *ByteDance Ltd., TikTok Ltd. And TikTok, LLC*

19 **KING & SPALDING LLP**

20 By: /s/ Geoffrey M. Drake
21 Geoffrey M. Drake, pro hac vice
22 David Mattern, pro hac vice
23 King & Spalding LLP
24 1180 Peachtree Street, NE, Suite 1600
25 Atlanta, GA 30309
26 Telephone: (404) 572-4600
27 Facsimile: (404) 572-5100
28 gdrake@kslaw.com
dmattern@kslaw.com

Attorneys for Defendants TikTok Inc., ByteDance Inc.,
ByteDance Ltd., TikTok Ltd. And TikTok, LLC

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Brian M. Willen
Brian M. Willen (*pro hac vice*)
Wilson Sonsini Goodrich & Rosati PC
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800

Facsimile: (212) 999-5899
bwillen@wsgr.com

Lauren Gallo White
Samantha A. Machock
Wilson Sonsini Goodrich & Rosati PC
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (947)-2099
lwhite@wsgr.com
smachock@wsgr.com

Christopher Chiou
Matthew K. Donohue
Wilson Sonsini Goodrich & Rosati PC
953 East Third Street, Suite 100
Los Angeles, CA 90013
Telephone: (323) 210-2900
Facsimile: (866) 974-7329
cchio@wsgr.com
mdonohue@wsgr.com

Attorneys for Defendants YouTube, LLC and Google LLC

WILLIAMS & CONNOLLY LLP

By: /s/ Joseph G. Petrosinelli
Joseph G. Petrosinelli, *pro hac vice*
Ashley W. Hardin, *pro hac vice*
680 Maine Avenue, SW
Washington, DC 20024
Tel.: 202-434-5000
Fax: 202-434-5029
Email: jpetrosinelli@wc.com
Email: ahardin@wc.com

*Attorneys for Defendants YouTube, LLC and
Google LLC*

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Yarden R. Zwang-Weissman
Yarden R. Zwang-Weissman
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
Tel.: 213.612.7238

Email: yardena.zwangweissman@morganlewis.com
Brian Ercole (*pro hac vice*)
600 Brickell Avenue, Suite 1600
Miami, FL 33131-3075
Tel.: 305.415.3416
Email: brian.ercole@morganlewis.com
Stephanie Schuster (*pro hac vice*)
1111 Pennsylvania Avenue NW
NW Washington, DC 20004-2541
Tel.: 202.373.6595
Email: stephanie.schuster@morganlewis.com

Attorneys for Defendants YouTube, LLC and Google LLC

MUNGER, TOLLES & OLSEN LLP

By: /s/ Jonathan H. Blavin
Jonathan H. Blavin
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

Rose L. Ehler
Victoria A. Degtyareva
Laura M. Lopez
Rowley J. Rice
Ariel T. Teshuva
Faye Paul Teller
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
Email: rose.ehler@mto.com
Email: victoria.degtyareva@mto.com
Email: laura.lopez@mto.com
Email: rowley.rice@mto.com
Email: ariel.teshuva@mto.com
Email: faye.teller@mto.com

Lauren A. Bell (*pro hac vice*)
601 Massachusetts Ave., NW St.
Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300
Email: lauren.bell@mto.com

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

By: /s/ Jessica Davidson

Jessica Davidson, pro hac vice
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
One Manhattan West
New York, New York 10001
Phone: (212) 735-3222
Fax: (917) 777-3222
jessica.davidson@skadden.com

Nina R. Rose, pro hac vice
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005
Telephone: (202) 371-7000
Facsimile: (202) 661-0525
nina.rose@skadden.com

Attorneys for Defendant Snap Inc.

LEXI J. HAZAM
Lief Cabraser Heimann & Bernstein, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415-956-1000
lhazam@lchb.com

PREVIN WARREN
Motley Rice LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER
Seeger Weiss, LLP
55 Challenger Road, 6th floor
Ridgefield Park, NJ 07660
Telephone: 973-639-9100
Facsimile: 973-679-8656
cseeger@seegerweiss.com

1 Counsel to Co-Lead Counsel and Settlement
2 Counsel

3 JENNIE LEE ANDERSON
4 Andrus Anderson, LLP
5 155 Montgomery Street, Suite 900
6 San Francisco, CA 94104
7 Telephone: 415-986-1400
8 jennie@andrusanderson.com

9 Liaison Counsel

10 JOSEPH G. VANZANDT
11 Beasley Allen Crow Methvin Portis & Miles, P.C.
12 234 Commerce Street
13 Montgomery, AL 36103
14 Telephone: 334-269-2343
15 joseph.vanzandt@beasleyallen.com

16 EMILY C. JEFFCOTT
17 Morgan & Morgan
18 220 W. Garden Street, 9th Floor
19 Pensacola, FL 32502
20 Telephone: 850-316-9100
21 ejeffcott@forthepeople.com

22 Federal/State Liaison Counsel

23 MATTHEW BERGMAN
24 GLENN DRAPER
25 Social Media Victims Law Center
26 600 1st Avenue, Suite 102-PMB 2383
27 Seattle, WA 98104
28 Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

JAMES J. BILSBORROW
Weitz & Luxenberg, PC
700 Broadway
New York, NY 10003
Telephone: 212-558-5500
Facsimile: 212-344-5461
jbilsborrow@weitzlux.com

JAYNE CONROY
Simmons Hanly Conroy, LLC

1 112 Madison Ave, 7th Floor
2 New York, NY 10016
3 Telephone: 917-882-5522
jconroy@simmonsfirm.com

4 ANDRE MURA
5 Gibbs Law Group, LLP
6 1111 Broadway, Suite 2100
7 Oakland, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

8 ALEXANDRA WALSH
9 Walsh Law
10 1050 Connecticut Ave, NW, Suite 500
11 Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

12 MICHAEL M. WEINKOWITZ
13 Levin Sedran & Berman, LLP
14 510 Walnut Street, Suite 500
15 Philadelphia, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

16 Plaintiffs' Steering Committee Leadership

17 RON AUSTIN
18 Ron Austin Law
19 400 Manhattan Blvd.
20 Harvey, LA 70058
Telephone: (504) 227-8100
raustin@ronaustinlaw.com

21 PAIGE BOLDT
22 Watts Guerra LLP
23 4 Dominion Drive, Bldg. 3, Suite 100
24 San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@WattsGuerra.com

25 THOMAS P. CARTMELL
26 Wagstaff & Cartmell LLP
27 4740 Grand Avenue, Suite 300
28 Kansas City, MO 64112
Telephone: 816-701-1100

1 tcartmell@wcllp.com

2 SARAH EMERY
3 RONALD E. JOHNSON, JR.
4 Hendy Johnson Vaughn Emery PSC
600 West Main Street, Suite 100
Louisville, KY 40202
Telephone: 859-600-6725
semery@justicestartshere.com
rjohnson@justicestartshere.com

7 CARRIE GOLDBERG
8 C.A. Goldberg, PLLC
16 Court St.
9 Brooklyn, NY 11241
Telephone: 646-666-8908
10 carrie@cagoldberglaw.com

11 SIN-TING MARY LIU
12 Aylstock Witkin Kreis & Overholtz, PLLC
17 East Main Street, Suite 200
13 Pensacola, FL 32502
Telephone: 510-698-9566
14 mliu@awkolaw.com

15 JAMES MARSH
16 Marsh Law Firm PLLC
31 Hudson Yards, 11th floor
17 New York, NY 10001-2170
Telephone: 212-372-3030
18 jamesmarsh@marshlaw.com

19 JOSEPH E. MELTZER
20 MELISSA YEATES
Kessler Topaz Meltzer & Check LLP
21 280 King of Prussia Road
Radnor, PA 19087
22 Telephone: 610-667-7706
jmeltzer@ktmc.com
23 myeates@ktmc.com

24 HILLARY NAPPI
25 Hach & Rose LLP
112 Madison Avenue, 10th Floor
26 New York, New York 10016
Telephone: 212-213-8311
27 hnappi@hrsclaw.com

EMMIE PAULOS
Levin Papantonio Rafferty
316 South Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
The Carlson LawFirm, PC
1500 Rosecrans Ave., Ste. 500
Manhattan Beach, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
Baron & Budd, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: 818-839-2333
Facsimile: (818) 986-9698
rtellis@baronbudd.com
dfernandes@baronbudd.com

DIANDRA "FU" DEBROSSE ZIMMERMANN
Dicello Levitt
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicellolevitt.com

Attorneys for Individual Plaintiffs

ATTESTATION

I, Gregory L. Halperin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 6, 2024

By: /s/ Gregory L. Halperin

Gregory L. Halperin